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September 20, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Wednesday, September 19, 2012, Lance Steinhart, John Nakahata, and Kasey Chow, on behalf of Aegis Telecom, Inc. dba Off The Hook Telecom (“Aegis” or the “Company”), as well as Robert Clark, Owner of Aegis, and Joseph Fernandez spoke with Kimberly Scardino, Divya Shenoy, Alexander Minard, David Bradford, and Michelle Schaefer of the Telecommunications Access Policy Division. We discussed Aegis’ Compliance Plans as amended on September 5, 2012.

Robert Clark gave an introduction and overview of the Company, including detail regarding the Company’s wireline and wireless ETC designations, current operations, current customers, and relationship with Telecom Service Bureau for back office support. Mr. Clark elaborated on the Company’s financial and technical capabilities and other target sources of revenue.

We discussed requested changes to the Company’s certification forms, marketing materials and website. Finally, Aegis agreed to file a revised Compliance Plan with all suggested changes and additions.

Attached is a copy of the presentation deck that was provided at the meeting yesterday; the sample certification forms and sample marketing materials provided at the meeting were filed as Exhibits B and C in the Company’s wireless Compliance Plan and Exhibits A and B in the Company’s wireline Compliance Plan.

Ms. Marlene H. Dortch
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Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart
Attorney for Aegis Telecom, Inc. dba Off The Hook Telecom

cc: John Nakahata
Kimberly Scardino
Divya Shenoy
Alexander Minard
David Bradford
Michelle Schaefer

FCC COMPANY OVERVIEW MEETING



September 19, 2012

INTRODUCTION

Aegis Telecom, Inc. dba Off The Hook Telecom

- Aegis Telecom incorporated July 23, 2009
- Began seeking CLEC and ETC wireline designations to begin offering pre-paid residential service through an AT&T Interconnection Agreement in 2 states.
- Developed the dba Off The Hook Telecom and began seeking Wireless ETC designation in 6 states.
- Aegis Telecom, Inc. dba Off The Hook Telecom began offering service in Missouri in October 2011.

INTRODUCTION

- ◉ Founded and Owned by Robert Clark
- ◉ Companies Currently Provide Lifeline Service in:
Alabama – Wireline
Missouri – Wireless
- ◉ Key Partners: Sprint PCS, TSB, CGM, BeQuick
- ◉ Corporate Websites
 - www.AegisTelecom.net
 - www.OffTheHookTelecom.net

Lifeline Product Offerings

	250 Minute Plan	100 Minute Plan
Price to Lifeline Subscriber	FREE	FREE
Number of Free Minutes	250	100
Rollover	N	Y
Text Messaging	N	3:1

Additional Top Up Amounts	Price	Rollover	Texting Ratio	Price Per Minute
100 Minutes	\$5.00	N	3:1	\$0.05
225 Minutes	\$10.00	N	3:1	\$0.04
500 Minutes	\$20.00	N	3:1	\$0.04
Unlimited Minutes	\$30.00	N	1:1	

All plans include:

- Free handset
- Free Calls to 911 Emergency Services
- Free Calls to Customer Service and Balance Inquiries
- Free Voicemail, Caller ID, and Call waiting
- Free Domestic Long Distance Calling

Lifeline Product Offerings

Aegis Telecom, Inc. (Wireline)

No current Wireline Service, but will offer service similar to other companies in the market place.

BASIC SERVICE	\$44.25 (plus tax)
PREMIER PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, AND CALL WAITING ID	\$49.25 (plus tax)
COMPLETE PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, CALLER WAITING ID, *69, 3-WAY, & CALL FORWARDING	\$54.25 (plus tax)
LIFELINE BASIC SERVICE	\$35.00 (plus tax)
LIFELINE PREMIER PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, AND CALL WAITING ID	\$40.00 (plus tax)
LIFELINE COMPLETE PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, CALLER WAITING ID, *69, 3-WAY, & CALL FORWARDING	\$45.00 (plus tax)

Marketing & Advertising Compliance

- Disclose company name on all marketing/publications and
- Explain in clear, easily understood language :
 - The service is a Lifeline service;
 - Only eligible consumers may enroll in the program;
 - That documentation is necessary for enrollment;
 - The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - Lifeline is a government benefit program; Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program; and
 - Lifeline service is non-transferable.

Distribution Methodology

- In-Person Sales: Face-to-face enrollment transaction usually occurring at an event. All documentation can be witnessed in real-time and end user walks away with phone.
- Phone Sales: Real-time, but proof of eligibility and completed certification form must be mailed/faxed, delaying shipment of phone.
- Internet Sales: Self-driven enrollment by end user who signs certification form electronically to complete transaction. Proof of eligibility must be mailed/faxed, delaying shipment of phone.

Lifeline Enrollment

Company's Enrollment Process requires confirmation of the following 6 items:

1. Confirm applicant's identity. (in person, see government issued picture ID)
2. Confirm program or income eligibility. (eligibility database, or see proof of participation or annual household income)
3. Confirm valid residence address and whether the address is permanent/temporary or multi-household. (Validate address via Melissa Data)
4. Confirm applicant is not currently receiving a subsidy from another carrier.
 - Applicant Certifies under penalty of perjury.
 - Specifically mention other providers in certification.
 - Company performs duplicate check into an internal and pooled external database. (TSB & CGM clients)
5. Procure all required authorizations and certifications.
6. Confirm applicant receives handset and personally activates or uses the phone prior to seeking reimbursement from Universal Service Fund.

Annual Recertification

- The Company will re-certify the eligibility of all its Lifeline customers as of June 1, 2012. This recertification will be concluded by the end of the year, and the results of the recertification will be sent to USAC by January 1, 2013.
- The Company will continue to re-certify each lifeline end user annually (wireline and wireless).
- All customers who fail to respond to recertification attempts within 30 days will be given an written notice that they have 30 days to confirm their eligibility or be de-enrolled from the Lifeline program.
- Additionally, The Company will follow any state-specific recertification requirements.

Waste, Fraud, and Abuse Prevention

- Marketing/ Advertising
- End User Initial Enrollment & Annual Certification
- Agent Compliance Training Program
- Customer Non Usage (wireless)
- Duplicate Detection:
 - CGM IDD database (across all CGM/TSB companies)
 - National Database (when operational)
- Survey customers on at least 25% of completed orders
- Quarterly internal process reviews

QUESTIONS?

Thank You